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CLERK OF COURT
PRINCE WILLIAM COUNTY, VA
LIBERTY

VIRGINIA:

IN THE PRINCE WILLIAM COUNTY CIRCUIT COURT

MITRA HOOSHANGI,

Plaintiff,

vs.

ROSS DRESS FOR LESS, INC.
AND ANY AND ALL
OFFICERS AND EMPLOYEES

Defendant.

Case No.

021-0203

COMPLAINT

COMES NOW the Plaintiff, MITRA HOOSHANGI, "HOOSHANGI" by counsel, and for her Complaint against the Defendants, ROSS DRESS FOR LESS, INC., AND ANY AND ALL OFFICERS AND EMPLOYEES, "ROSS", states her grounds as follows:

1. This Court has jurisdiction over this matter as it arises from an incident that occurred on January 10th, 2019 at the Ross Dress for Less Store located at 10822 Sudley Manor Drive, Manassas, Virginia 20109.
2. At all times relevant hereto, Hooshangi, was a resident of the state of Virginia.
3. At all times relevant hereto, Ross, owned, operated, maintained, managed, rented, leased, serviced, was responsible for and/or otherwise controlled the premises located at 10822 Sudley Manor Drive, Manassas, Virginia 20109.

COUNT 1

(Negligence)

4. Hooshangi refers to and incorporates the preceding paragraphs as if fully stated

EXHIBIT
A

herein.

5. On or about January 10, 2019, Hooshangi was an invitee on the premises located at 10822 Sudley Manor Drive, Manassas, Virginia 20109, known as "Ross Dress for Less," a clothing store.

6. At approximately 2:55p.m. on January 10, 2019, Hooshangi was walking out of a dressing room in the clothing section when she slipped and fell on a greasy substance on the smooth surface of the flooring, causing serious injuries.

7. At all times relevant hereto, Ross, owed obligations and duties to Hooshangi to make sure the premises at located at 10822 Sudley Manor Drive, Manassas, Virginia 20109, was in a reasonably safe condition free of defects and dangerous conditions of which they knew or should have known to exist and/or warn Hooshangi of said defects and/or dangerous conditions of which they knew or should have known to exist and which Hooshangi would not detect through reasonable inspection.

8. Notwithstanding those obligations and duties aforesaid, Ross, breached their obligations and duties owed to Hooshangi by negligently causing, allowing to remain, failing to warn of a dangerous and defective condition on the premises consisting of a liquid substance on the floor, on the premises of Ross.

9. As a result of the fall and as a direct and proximate result of Ross's, negligence, Hooshangi suffered numerous bodily injuries including, but not limited to, severe and permanent bodily injuries, physical pain and suffering, inconvenience, mental anguish, scarring, disfigurement, humiliation and embarrassment, all in the past and continuing into the future, as well as incurring expenses for the medical services rendered by health care providers for the diagnosis and treatment of his injuries.

10. At all times mentioned herein, Hooshangi was an invitee.

11. As an invitee, Hooshangi had the right to assume that the premises were reasonably safe for his visit.

12. Ross had a duty to use ordinary care to have the premises in a safe condition for the use all invitees, including Hooshangi.

13. Ross also had a duty to warn all invitees, including Hooshangi, of any unsafe condition, about which they knew or by the use of ordinary care should have known existed.

14. Notwithstanding these duties, Ross was negligent by failing to have the premises in a safe condition and/or by failing to warn Hooshangi of the unsafe condition that they knew or should have known existed for invitees at the premises.

15. The negligence of Ross was the proximate cause of the bodily injuries suffered by Hooshangi.

WHEREFORE the Plaintiff, by counsel, moves for a judgment against the Defendant ROSS DRESS FOR LESS, INC., AND ANY AND ALL OFFICERS AND EMPLOYEES for compensatory damages in the amount of FIVE HUNDRED THOUSAND Dollars and ZERO Cents (\$500,000.00) with costs and interest from January 10, 2019.

PLAINTIFF DEMANDS A TRIAL BY JURY.

MITRA HOOSHANGI,

By Counsel

THE DAUGHERTY LAW FIRM, PC

A handwritten signature in black ink, appearing to read "Justin", is positioned above a horizontal line.

Justin Daniel, Esquire
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Counsel for Plaintiff

COVER SHEET FOR FILING CIVIL ACTIONS

COMMONWEALTH OF VIRGINIA

Case No.

021-0263
(CLERK'S OFFICE USE ONLY)

PRINCE WILLIAM COUNTY

Circuit Court

MITRA HOOSHANGI

v./In re:

ROSS DRESS FOR LESS, INC.

PLAINTIFF(S)

DEFENDANT(S)

I, the undersigned ☒ plaintiff ☐ defendant ☐ attorney for ☐ plaintiff ☐ defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

Subsequent Actions

- ☐ Claim Impleading Third Party Defendant
 - ☐ Monetary Damages
 - ☐ No Monetary Damages
- ☐ Counterclaim
 - ☐ Monetary Damages
 - ☐ No Monetary Damages
- ☐ Cross Claim
- ☐ Interpleader
- ☐ Reinstatement (other than divorce or driving privileges)
- ☐ Removal of Case to Federal Court

Business & Contract

- ☐ Attachment
- ☐ Confessed Judgment
- ☐ Contract Action
- ☐ Contract Specific Performance
- ☐ Detinue
- ☐ Garnishment

Pro

- ☐ Eminent Domain
- ☐ Ejectment
- ☐ Encumbrance Self Real Estate
- ☐ Force and/or Lien
- ☐ Escheatment
- ☐ Establish Boundaries
- ☐ Landlord/Tenant
- ☐ Unlawful Detainer
- ☐ Mechanics Lien
- ☐ Partition
- ☐ Quiet Title
- ☐ Termination of Mineral Rights

Tort

- ☐ Asbestos Litigation
- ☐ Compromise Settlement
- ☐ Intentional Tort
- ☐ Medical Malpractice
- ☐ Motor Vehicle Tort
- ☐ Product Liability
- ☐ Wrongful Death
- ☒ Other General Tort Liability

ADMINISTRATIVE LAW

- ☐ Appeal/Judicial Review of Decision of (select one)
 - ☐ ABC Board
 - ☐ Board of Zoning
 - ☐ Compensation Board
 - ☐ DMV License Suspension
 - ☐ Employee Grievance Decision
 - ☐ Employment Commission
 - ☐ Local Government
 - ☐ Marine Resources Commission
 - ☐ School Board
 - ☐ Voter Registration
 - ☐ Other Administrative Appeal

DOMESTIC/FAMILY

- ☐ Adoption
 - ☐ Adoption Foreign
- ☐ Adult Protection
- ☐ Annulment
 - ☐ Annulment Counterclaim/Responsive Pleading
- ☐ Child Abuse and Neglect Unfounded Complaint
- ☐ Civil Contempt
- ☐ Divorce (select one)
 - ☐ Complaint - Contested*
 - ☐ Complaint - Uncontested*
 - ☐ Counterclaim/Responsive Pleading
 - ☐ Reinstatement
 - ☐ Custody/Visitation/Support Equitable Distribution
 - ☐ Separate Maintenance
 - ☐ Separate Maintenance Counterclaim

WRITS

- ☐ Certiorari
- ☐ Habeas Corpus
- ☐ Mandamus
- ☐ Prohibition
- ☐ Quo Warranto

PROBATE/WILLS AND TRUSTS

- ☐ Accounting
- ☐ Aid and Guidance
- ☐ Appointment (select one)
 - ☐ Guardian/Conservator
 - ☐ Standby Guardian/Conservator
 - ☐ Custodian/Successor Custodian (UFMA)
- ☐ Trust (select one)
 - ☐ Impress/Declare/Create
 - ☐ Reformation
- ☐ Will (select one)
 - ☐ Construe
 - ☐ Contested

MISCELLANEOUS

- ☐ Amend Death Certificate
- ☐ Appointment (select one)
 - ☐ Church Trustee
 - ☐ Conservator of Peace
 - ☐ Marriage Celebrant
- ☐ Approval of Transfer of Structured Settlement
- ☐ Bond Forfeiture Appeal
- ☐ Declaratory Judgment
- ☐ Declare Death
- ☐ Driving Privileges (select one)
 - ☐ Reinstatement pursuant to § 46.2-427
 - ☐ Restoration Habitual Offender or 3rd Offense
- ☐ Expungement
- ☐ Firearms Rights - Restoration
- ☐ Forfeiture of Property or Money
- ☐ Freedom of Information
- ☐ Injunction
- ☐ Interdiction
- ☐ Interrogatory
- ☐ Judgment Lien-Bill to Enforce
- ☐ Law Enforcement/Public Official Petition
- ☐ Name Change
- ☐ Referendum Elections
- ☐ Sever Order
- ☐ Taxes (select one)
 - ☐ Correct Erroneous State/Local
 - ☐ Delinquent
- ☐ Vehicle Confiscation
- ☐ Voting Rights Restoration
- ☐ Other (please specify)

☒ Damages in the amount of \$ 500,000.00

are claimed.

1/8/21

DATE

JUSTIN DANIEL, ESQ.

PROXIMATE

THE DAUGHERTY LAW FIRM, PC

ADDRESS TELEPHONE NUMBER OF SIGNATOR

9315 CENTER STREET, #106, MANASSAS, VA 20110-7033 335-6468

JUSTIN@DAUGHERTYLAWPC.COM

E-MAIL ADDRESS OF SIGNATOR (OPTIONAL)

FORM CC-1416 (MASTER) PAGE ONE OF 16

*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

**Civil Action Type Codes
(Clerk's Office Use Only)**

Accounting	ACCT	Ejectment	EJET
Adoption	ADOP	Encumber/Sell Real Estate	RE
Adoption – Foreign	FORA	Enforce Vendor's Lien	VEND
Adult Protection	PROT	Escheatment	ESC
Aid and Guidance	AID	Establish Boundaries	ESTB
Amend Death Certificate	ADC	Expungement	XPUN
Annexation	ANEX	Forfeiture of Property or Money	FORF
Annulment	ANUL	Freedom of Information	FOI
Annulment – Counterclaim/Responsive Pleading	ACRP	Garnishment	GARN
Appeal/Judicial Review		Injunction	INJ
ABC Board	ABC	Intentional Tort	ITOR
Board of Zoning	ZONE	Interdiction	INTD
Compensation Board	ACOM	Interpleader	INTP
DMV License Suspension	JR	Interrogatory	INTR
Employment Commission	EMP	Judgment Lien – Bill to Enforce	LIEN
Employment Grievance Decision	GRV	Landlord/Tenant	LT
Local Government	GOVT	Law Enforcement/Public Official Petition	LEP
Marine Resources	MAR	Mechanics Lien	MECH
School Board	JR	Medical Malpractice	MED
Voter Registration	AVOT	Motor Vehicle Tort	MV
Other Administrative Appeal	AAPL	Name Change	NC
Appointment		Other General Tort Liability	GTOR
Conservator of Peace	COP	Partition	PART
Church Trustee	AOCT	Permit, Unconstitutional Grant/Denial by Locality	LUC
Custodian/Successor Custodian (UTMA)	UTMA	Petition – (Miscellaneous)	PET
Guardian/Conservator	APPT	Product Liability	PROD
Marriage Celebrant	ROMC	Quiet Title	QT
Standby Guardian/Conservator	STND	Referendum Elections	ELEC
Approval of Transfer of Structured Settlement	SS	Reinstatement (Other than divorce or driving privileges)	REIN
Asbestos Litigation	AL	Removal of Case to Federal Court	REM
Attachment	ATT	Restore Firearms Rights – Felony	RFRF
Bond Forfeiture Appeal	BFA	Restore Firearms Rights – Review	RFRR
Child Abuse and Neglect – Unfounded Complaint	CAN	Separate Maintenance	SEP
Civil Contempt	CCON	Separate Maintenance – Counterclaim/Responsive Pleading	SCRP
Claim Impleading Third Party Defendant – Monetary Damages/No Monetary Damages	CTP	Sever Order	SEVR
Complaint – (Miscellaneous)	COM	Sex Change	COS
Compromise Settlement	COMP	Taxes	
Condemnation	COND	Correct Erroneous State/Local	CTAX
Confessed Judgment	CJ	Delinquent	DTAX
Contract Action	CNTR	Termination of Mineral Rights	MIN
Contract Specific Performance	PERF	Trust -- Impress/Declare/Create	TRST
Counterclaim – Monetary Damages/No Monetary Damages	CC	Trust – Reformation	REFT
Cross Claim	CROS	Uniform Foreign Country Money Judgments	RFCJ
Declaratory Judgment	DECL	Unlawful Detainer	UD
Declare Death	DDTH	Vehicle Confiscation	VEH
Detinue	DET	Voting Rights – Restoration	VOTE
Divorce		Will Construction	CNST
Complaint – Contested/Uncontested	DIV	Will Contested	WILL
Counterclaim/Responsive Pleading	DCRP	Writs	
Reinstatement – Custody/Visitation/Support/ Equitable Distribution	CVS	Certiorari	WC
Driving Privileges		Habeas Corpus	WHC
Reinstatement pursuant to § 46.2-427	DRIV	Mandamus	WM
Restoration – Habitual Offender or 3 rd Offense	REST	Prohibition	WP
		Quo Warranto	WQW
		Wrongful Death	WD